

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CONCORD MANAGEMENT AND
CONSULTING LLC**

Defendant.

Crim. No. 18-CR-32-2 (DLF)

GOVERNMENT’S MOTION FOR LEAVE TO FILE UNDER SEAL

The United States of America respectfully moves for leave to file under seal its opposition to defendant Concord Management and Consulting LLC’s motion to compel (Dkt. No. 78). The government’s opposition discusses a “matter occurring before the grand jury,” Fed. R. Crim. P. 6(e)(2)(B). Therefore, filing the opposition under seal is appropriate under Federal Rule of Criminal Procedure 6(e)(2)(B)(vi) and Rule 6(e)(6).

Respectfully submitted,

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By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2019 I caused a copy of the foregoing motion for leave to file under seal to be transmitted to Katherine Seikaly and Eric Dubelier, counsel of record for Concord Management and Consulting LLC, via email and first class mail.

By: /s/

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PROPOSED ORDER

Upon consideration of the motion of the United States of America for leave to file under seal, it is hereby

ORDERED that the motion is GRANTED.

Accordingly, the government's opposition to defendant Concord Management and Consulting LLC's motion to compel shall be filed under seal.

Date

DABNEY L. FRIEDRICH
United States District Judge